LAW OFFICES
GOLDBERG, GODLES, WIENER & WRIGHT LLP
1025 Connecticut Avenue, N.W., Suite 1000
WASHINGTON, D.C. 20036-5417

HENRY GOLDBERG
JOSEPH A. GODLES
JONATHAN L. WIENER

W. KENNETH FERREE*
HENRIETTA WRIGHT
THOMAS G. GHERARDI, P.C.
COUNSEL

THOMAS S. TYCZ**
SENIOR POLICY ADVISOR
*NOT ADMITTED IN DC
**NOT AN ATTORNEY

(202) 429-4900
FAX:
(202) 327-5499
e-mail:
general@g2w2.com
website: www.g2w2.com

June 13, 2019

FILED ELECTRONICALLY VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

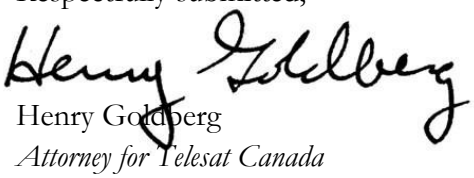
Re: *Ex Parte*, IB Docket No. 18-313

Dear Ms. Dortch:

On June 12, 2018, the undersigned and Joseph A. Godles, as counsel to Telesat Canada ("Telesat"), had a phone conversation with Karl Kensinger of the FCC's International Bureau concerning the above-referenced proceeding. They made the points shown in the attachment to this letter.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,



Henry Goldberg
Attorney for Telesat Canada

cc: Karl Kensinger

Attachment

- Satellites that are non-functional upon deployment present a heightened risk of collision because they cannot be adequately controlled
- One dead on arrival ("DOA") scenario presents special risks, *i.e.*, using an injection orbit that is at or near the operational orbit of another system
- If satellites using such an injection orbit are DOA, they will be in the vicinity of other space stations with which they could collide
- This risk was brought home to Telesat recently when it learned another operator, upon launch, had directly injected satellites at an altitude of 1000 km, which is the operational altitude for Telesat's LEO constellation
- Telesat is not trying to single out any particular operator, but wants to raise awareness of this issue and has been in contact with the other operator directly to make known our concerns
- To address the injection orbit issue, the Commission should:

    - Clarify that the conditions it has been including with NGSO grants, which require coordinating physical operations of spacecraft with any operator using similar orbits, apply to physical operations during LEOP
    - Establish a presumption that a direct injection should be prohibited if it overlaps with the orbit of an authorized or operating constellation
    - Absent such an overlap, leave it to the parties in the first instance to determine in coordination the separation distance required for space safety purposes between a direct injection and the orbit of an authorized or operating constellation